



Frontier Airlines, Inc.
4545 Airport Way
Denver, Colorado 80239

In the Matter of :

Petition of Aviation Spectrum
Resources, Inc. for Amendment of
Sections 87.173(b) and 87.263(a) of
the FCC's Rules to Allow Use of the
Lower 136 MHz Band by Aeronautical
Enroute Stations

COMMENTS OF FRONTIER AIRLINES

Frontier Airlines provides the following comments on the petition for rulemaking submitted by Aviation Spectrum Resources, Inc. ("ASRI") on changes to Aeronautical Enroute Stations ("AES") used for aviation datalinks. Frontier Airlines is a commercial passenger airline providing ultra low cost service to passengers throughout North America. Our operations are highly dependent upon the datalink services provided by the service providers mentioned below.

The Federal Aviation Administration's ("FAA") DataComm program is operating under contract to the Harris Corporation, using existing commercial VHF data link service providers Rockwell Collins and SITAONAIR to deliver both Aeronautical Operational Control ("AOC") and Air Traffic Control ("ATC") communications. The program is a joint Federal and industry success story and is an important part of the both the FAA's modernization program and Frontier Airlines' future operations.

Current DataComm stations operate within the 136.500 to 136.975 MHz band, and are licensed by ASRI under the AES station class. The ASRI proposal will extend the use of the AES frequencies to the 136.000 - 136.4875 MHz band, enabling increased network capacity as the DataComm program continues to grow across the US national airspace. Frontier Airlines believes this additional capacity needs to begin implementation as early as possible to meet aviation traffic demands.

To summarize, Frontier Airlines fully endorses the proposal for the following reasons:

1. Use of the 136.500 to 136.975 MHz VHF frequencies is currently shared by AOC and ATC. Expansion to include the whole 136.000 to 136.975 MHz range is in line with the aviation allocation for these frequencies and makes more efficient use of existing aviation spectrum.
2. The DataComm program, currently operating in the 136.500 to 136.975 MHz band, has already successfully resulted in increased safety, operational benefits, and cost savings to the FAA and the airlines. To continue this program will only help the airlines and the general public

As a member of the Aeronautical Frequency Committee ("AFC"), Frontier Airlines can attest to that many interested stakeholders within aviation including airlines, business operators, helicopter interests and the FAA have met and discussed this matter many times, and ALL are in full support of this proposal. We believe the use of this lower 136 MHz band will continue to improve flight safety and efficiency for the US Airspace. Given the above, Frontier Airlines fully supports the petition of ASRI and requests the FCC to quickly action the proposed changes as stated.

Respectfully,
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